

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

FILED

PH

3/17/2025

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

YATASIA Flemming, Bene
for YATASIA D FLEMMING,
Estate

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

1:25-cv-02441
Judge Franklin U. Valderrama
Magistrate Judge Gabriel A. Fuentes
Case 1
(To 1 Cat 2 Random

Guaranteed Rate Affinity, LLC

Pennymac Loan Services, LLC

Steward Title Company

Law Offices of Ira T. Nereb, LLC

Circuit Court Cook County

Clerk, Mariyana T. Spyropoulos
(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

RECEIVED

MAR 07 2025 *LC*

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

CHECK ONE ONLY:

 COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

 X **COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE**
28 SECTION 1331 U.S. Code (federal defendants)

 OTHER (cite statute, if known)

BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

I. Plaintiff(s):

- A. Name: YATASIA Flemming for YATASIA D. FLEMING
- B. List all aliases: _____
- C. Prisoner identification number: _____
- D. Place of present confinement: _____
- E. Address: % 7112 S. Rhodes Avenue, Chgo, IL 60619

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: Victor Ciardelli
Title: President and CEO
Place of Employment: % Guaranteed Rate Affinity, LLC
- B. Defendant: David A. Spector
Title: CEO and Chairman
Place of Employment: % PennyMac Loan Services, LLC
- C. Defendant: Frederick H. Eppinger
Title: CEO
Place of Employment: % Steward Title company

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

II. Defendants (cont.)

D. Natasha Robinson - Defendant

Title: originating Manager

Place of Employment: Guaranteed Rate Affinity, LLC

E. Defendant: Rhonda L. Griffin

Title: Escrow Agent, Notary

Place of Employment: Steward Title Company

F. Defendant: Ira T. Nevel

Title: President

Place of Employment: Law offices of Ira T. Nevel, LLC

G. Defendant: Robin L. Redditt

Title: Attorney for Plaintiff @ closing

Place of Employment: The Law Office of Robin L. Redditt

H. Defendant: Patricia S. Spratt

Title: Judge, Circuit Court

Place of Employment: Circuit Court of Cook County

I. Defendant: Jason DeMarinis

Title: Law Clerk for both Judges

Place of Employment: Circuit Court of Cook County

J. Defendant: Mariyana T. Spyropoulos

Title: Clerk of the Circuit Court of Cook County

Place of Employment: Circuit Court of Cook County

K. Defendant: Bill Beckmann

Title: President and CEO % Mortgage Electronic Registration System (MERS)

Place of Employment: MERS CORP Holdings, Highland Park, Illinois

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: _____

- B. Approximate date of filing lawsuit: _____
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: _____

- D. List all defendants: _____

- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): _____
- F. Name of judge to whom case was assigned: _____

- G. Basic claim made: _____

- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): _____

- I. Approximate date of disposition: _____

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On August 13, 2021, I, YATASIA Flemming executed a promissory note under the assumption that Defendant(s) Guaranteed Rate Affinity, LLC was extending lawful consideration from their own capital reserves. Instead, Defendants monetized my promissory note, converting it unknowingly, unlawfully, into a investment vehicle, failing to disclose financial gain. Guaranteed Rate Affinity, LLC Failed to disclose that they created credit using YATASIA Flemming asset and real property. This transaction was Facilitated through Defendants Steward Tite company located 5151 W. 95th Street Ste 200, Oak Lawn, IL 60453 by Rhonda L. Griffin as Settlement Agent, Settlement Coordinator, Closing officer, and Notary Public. Plaintiffs ; Attorney Robin L. Redditt, breach contract for failure to highlight intrinsic details of the agreement.

Defendants engaged in deceptive banking, accounting, Scheme moving the obligation off balance sheet through securitization. unlawfully, Guaranteed Rate assigned Pennymac Loan Services, LLC as servicers with no proof of assignment. Defendants Penny Mac

Loan Services, LLC through its Attorneys, Defendant Law Offices of Ira T. Nevel, LLC, despite full settlement of the obligation, engaged in unlawful aggressive debt collection tactics, facilitating an illegal wrongful foreclosure and judicial sale. Wrongful foreclosure through the Circuit Court of Cook County-Chancery Division, Defendants, Judge, Patricia S. Spratt, and Defendant, Judge, James A. Wright of Calendar 64. Judges Clerk Defendant, Jason DeMarinis, and Circuit Clerk Defendant Mariyana T. Spyropoulos. With the title being split, this case should not have made it into the courtroom, misrepresenting a fully settled obligation as due and owing. Defendants, Law offices of Ira T. Nevel, Judge, Patricia S. Spratt, Judge, James A. Wright and Law Clerk, Jason DeMarinis Failed to provide adequate notice of hearings and access to an impartial hearing in the dealing of this alleged debt. Defendants, have no express written consent to administer the decedent's Estate. Defendants actions unfair and unjust mortgage collection, these willful violations continued after All where put on notice. This all violates my rights to due process. All defendants participated in this bank/IRS scheme, knowingly or unknowingly, without my authorization, willful authority to do so, made false book entries, reports, (Add. pg. →)

IV. Statement of Claim: continued (addon)

mortgages, notes, statements, securities, assignments, and judgements for their personal financial gain.

I did not enter into contract with Defendants, knowingly, willingly, or intentionally as terms of said contract was misrepresented, without full disclosure, with no evidence of equal consideration, no evidence of assignment, no evidence of oath of office nor any original documents to support their debt collection claim.

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Immediate forensic accounting of all transactions related to Plaintiff's alleged obligation. Declaratory relief voiding Defendants' fraudulent debt collection claim. Return of any misappropriated funds. Treble damages for unjust enrichment, in the amount of \$1,000,000,000,000.00 (One trillion dollars). An order requiring Defendants to cease and desist from unlawful conduct described in the claim. An injunction of case no. 2022CH10843

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this _____ day of _____, 20____

(Signature of plaintiff or plaintiffs) *Auth Rep*

Yatasia Flemming, Authorized Representative
(Print name)

(I.D. Number)

% 7112 S. Rhodes Ave

Chgo IL 60619
(Address)